Mr. Jon L' hommedieu
Altec Engineering, Inc.
28274 County Road 20
Elkhart, Indiana 46517-1128

Re: 039-14118
First Administrative Amendment
Part 70 No.: T039-7452-00188

Dear Mr. L' hommedieu:

Altec Engineering, Inc., located at 28274 County Road 20, Elkhart, Indiana 46517, was issued a Part 70 permit on May 11, 1998 for an open mold fiberglass manufacturing operation. A letter requesting a change in the permit was received on March 16, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The source is proposing to use a non-atomized application equipment in addition to the existing HVLP-F Air-Assisted-Airless and Magnum Flow Coat System used in the chop and the existing HVLP-F Air-Assisted-Airless System in the gel coat. The existing application systems were determined as the Best Available Control Technology (BACT) for the source's fiberglass operation. Since the proposed use of a non-atomized application system is more efficient than the existing systems, no new BACT analysis will be required. The change will also make the source in compliance with the requirements of 326 IAC 20-25, Styrene Rule. Amendment will be as follows (changes are bolded and deletions are struck-through for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) fiberglass hand layup operation, identified as LAYUP, with a maximum capacity of 797 lbs/hr, utilizing one sprayless roll coater, and exhausting to stack S-2.

(1) One (1) gelcoat operation, identified as GC1, utilizing HVLP-F air assisted airless spray guns, **or non-atomized application system** with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stack **S-1** ~~S-3~~.

(2) One fiberglass chop operation, identified as CH-1, utilizing either HVLP-F air assisted airless guns or a flow coat system **or non-atomized application system**, with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stack**s** S-2 & **S-3**.

SECTION D.1

(1)	One (1) fiberglass hand layup operation, identified as LAYUP, with a maximum capacity of 797 lbs/hr, utilizing one sprayless roll coater, and exhausting to stack S-2.
(2)	One (1) gelcoat operation, identified as GC1, utilizing HVLP-F air assisted airless spray guns, **or non-atomized application system** with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stack **S-1** ~~S-3~~.
(3)	One fiberglass chop operation, identified as CH-1, utilizing either HVLP-F air assisted airless guns or a flow coat system **or non-atomized application system**, with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stack**s** S-2 & **S-3**.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(1) Pursuant to CP 039-4936-00188, issued on November 21, 1996, and 326 IAC 8-1-6, the fiberglass panel manufacturing operations (CH-1, GC1 and LAYUP) are subject to BACT. The BACT conditions are:

(1) the utilization of Magnum HVLP-F Air Assisted Airless (AAA)* spray equipment **or non-atomized application system**; and

(2) the continual search to utilize lower styrene resins and gelcoats. The use of lower styrene resins and gelcoats shall be based on a current average of 31 percent styrene for gelcoats and 38 percent styrene for resins. The company shall also submit an annual report due the 1st of the year on progress in utilizing lower styrene resins and gelcoats as part of the BACT.

***** Air Assisted Airless (AAA) Spray Technology shall be used to apply coating to a substrate by means of coating application equipment which operates between 20 and 50 pounds per square inch gauge (psig) air pressure at the 11:1 resin pump. Their 20:1 gelcoat pump will normally operate between 50 and 80 pounds per square inch gauge (psig) air pressure. If higher pressures are required to spray lower styrene resin or gelcoats, appropriate documentation will be maintained.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Altec Engineering, Inc.
28274 County Road 20
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7452-00188	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: May 11, 1998
First Administrative Amendment No.: 039-14188	Pages Affected: 4, 28
Issued by: Paul Dubenetzky, Branch Chief Permit Branch Office of Air Quality	Issuance Date: March 30, 2001

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary open mold fiberglass manufacturing operation.

Responsible Official:	Gary Robinson
Source Address:	28274 County Road 20, Elkhart, IN 46517
Mailing Address:	28274 County Road 20, Elkhart, IN 46517
SIC Code:	3070
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) fiberglass hand layup operation, identified as LAYUP, with a maximum capacity of 797 lbs/hr, utilizing one sprayless roll coater, and exhausting to stack S-2.

(2) One (1) gelcoat operation, identified as GC1, utilizing HVLP-F air assisted airless spray guns, or non-atomized application system with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stack S-1.

(3) One fiberglass chop operation, identified as CH-1, utilizing either HVLP-F air assisted airless guns or a flow coat system or non-atomized application system, with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stacks S-2 & S-3.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (Nine (9) unit heaters, identified as U-1 through U-9, with the following capacities respectively: 0.206 MMBtu/hr, 0.200 MMBtu/hr, 0.200 MMBtu/hr, 0.300 MMBtu/hr, 0.220 MMBtu/hr, 0.150 MMBtu/hr, 0.150 MMBtu/hr, 0.220 MMBtu/hr and 0.150 MMBtu/hr) .

(2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(3) Infrared cure equipment, identified as U-10 and U-11, with maximum capacities of 0.175 MMBtu/hr each.

(4) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(5) Any operation using aqueous solutions containing less than 1% by weight of VOCs

SECTION D.1 FACILITY OPERATION CONDITIONS

(1)	One (1) fiberglass hand layup operation, identified as LAYUP, with a maximum capacity of 797 lbs/hr, utilizing one sprayless roll coater, and exhausting to stack S-2.
(2)	One (1) gelcoat operation, identified as GC1, utilizing HVLP-F air assisted airless spray guns, or non-atomized application system with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stack S-1.
(3)	One fiberglass chop operation, identified as CH-1, utilizing either HVLP-F air assisted airless guns or a flow coat system or non-atomized application system, with a maximum capacity of 797 lbs/hr, using dry filters for particulate control and exhausting to stacks S-2 & S-3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to CP 039-4936-00188, issued on November 21, 1996, and 326 IAC 8-1-6, the fiberglass panel manufacturing operations (CH-1, GC1 and LAYUP) are subject to BACT. The BACT conditions are:

(1) the utilization of Magnum HVLP-F Air Assisted Airless (AAA)* spray equipment or non-atomized application system; and

(2) the continual search to utilize lower styrene resins and gelcoats. The use of lower styrene resins and gelcoats shall be based on a current average of 31 percent styrene for gelcoats and 38 percent styrene for resins. The company shall also submit an annual report due the 1st of the year on progress in utilizing lower styrene resins and gelcoats as part of the BACT.

***** Air Assisted Airless (AAA) Spray Technology shall be used to apply coating to a substrate by means of coating application equipment which operates between 20 and 50 pounds per square inch gauge (psig) air pressure at the 11:1 resin pump. Their 20:1 gelcoat pump will normally operate between 50 and 80 pounds per square inch gauge (psig) air pressure. If higher pressures are required to spray lower styrene resin or gelcoats, appropriate documentation will be maintained.

(b) Pursuant to CP 039-4936-00188, issued on November 21, 1996, and to satisfy condition C.1, the VOC emissions of these three (3) fiberglass operations shall not exceed 20.75 tons of VOC per month. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

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D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Particulate Emission Limitations), the PM from the fiberglass operations (CH-1, GC1 and LAYUP) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and